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March 1, 2024

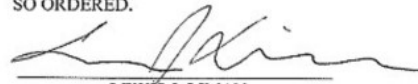
BY ECF AND EMAIL

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007
LimanNYSDChambers@nysd.uscourts.gov

REQUEST GRANTED IN PART FOR ALL DEFENDANTS.

The Court vacates the the schedule previously set at the initial conference. The Motion Hearing scheduled for April 4 is canceled. Instead, the Court will proceed with a Status Conference on April 4, 2024 at 11:00AM in Courtroom 15C at the 500 Pearl Street Courthouse.

3/1/2024 SO ORDERED.



LEWIS J. LIMAN
United States District Judge

RE: *United States v. Cristian Eustate Espinal, et al., 23-cr-577 (LJL)*

Dear Judge Liman:

I represent Cristian Espinal in this matter and in 23-cr-619 (JGLC), and I write on behalf of all defendants and with the government's consent to request that Your Honor vacate the schedule set at the initial appearance and schedule a conference in approximately 60 days. (The next conference in the related case is April 29, 2024).

The first discovery production was made in early January and because of technical issues, parts required replacement. The discovery includes proprietary surveillance files. I was not able to open the surveillance files until this week and needed help from a paralegal to do so. Cellebrite extractions have been produced for four phones. Three additional cell phones contain child pornography, and Cellebrite extractions cannot be made because they risk inadvertent disclosure of the illegal images. These phones must be examined by the defense team in an HSI office. In total, the Government has produced approximately one terabyte of data. The prosecutors and I have been working diligently, but so far I have seen only limited information extracted from my client's phones; my expert has not examined the phones. Thus, I am unable to file pretrial motions by the March 8 deadline. Moreover, Heriberto Eustate Espinal has requested a new lawyer. If his request is granted, new counsel will need time to review the discovery.

Accordingly, I respectfully request that the current schedule be vacated and that a conference be scheduled at the end of April 2024.

Respectfully submitted,



Jill R. Shellow

cc: All Counsel (by ECF)

Admitted: NY, CT, DC